



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

May 24, 1999

Susan Limon, Treasurer  
Tenet Healthcare Corporation  
Political Action Committee  
3820 State St.  
Santa Barbara, CA 93105

RE: MUR 4886

Dear Ms. Limon:

On May 19, 1999, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your behalf in settlement of a violation of 2 U.S.C. § 432(b)(2)(B), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter.

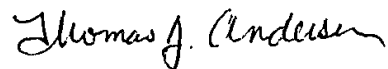
The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Susan Limon, Treasurer  
MUR 4886  
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Enclosed you will find a copy of the fully executed conciliation agreement for your files.  
If you have any questions, please contact me at (202) 694-1650.

Sincerely,



Thomas J. Andersen  
Attorney

Enclosure  
Conciliation Agreement

05:47:23 PM 10/29/09

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of	)	
	)	MUR 4886
Tenet Healthcare Corporation Political Action Committee	)	
and Susan Limon, as treasurer	)	

**CONCILIATION AGREEMENT**

This matter was initiated by the Federal Election Commission ("Commission") pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities.

The Commission found reason to believe Tenet Healthcare Corporation Political Action Committee and Susan Limon, as treasurer ("Respondents"), violated 2 U.S.C. § 432(b)(2)(B).

NOW, THEREFORE, the Commission and Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Tenet Healthcare Corporation Political Action Committee ("TenetPAC") is a political committee within the meaning of 2 U.S.C. § 431(4) and a person within the meaning of 2 U.S.C. § 431(11).

2. Susan Limon is TenetPAC's treasurer.
3. TenetPAC is the separate segregated fund of Tenet Healthcare Corporation.
4. The Federation of American Health Systems Political Action Committee ("FedPAC") is a political committee within the meaning of 2 U.S.C. § 431(4).

5. Pursuant to the Federal Election Campaign Act of 1971, as amended, every person who receives a contribution for a political committee which is not an authorized political committee shall, if the amount of the contribution is in excess of \$50, forward to the treasurer the contribution, the name and address of the person making the contribution, and the date of receipt of the contribution, no later than 10 days after receiving it. 2 U.S.C. § 432(b)(2)(B); 11 C.F.R. § 102.8(b)(2). If the amount of the contribution is in excess of \$200, the person forwarding the contribution shall identify the contributor's occupation and employer. *Id.*; 11 C.F.R. § 100.12.

6. In Schedule B of its 1997 Year End Report, TenetPAC disclosed a \$35,350 contribution on December 22, 1997, to FedPAC. The contribution was described as "FedPAC – Earmarked Contributions solicited through TenetPAC."

7. In Schedule A of its 1997 Year End Report, TenetPAC disclosed contributions received from 27 executives of Tenet Healthcare between November 7 and December 22, 1997, described as "earmarked for FedPAC." The contributions ranged in amounts from \$500 to \$3,000.

8. Because all the contributions were greater than \$50, TenetPAC was required to forward them to FedPAC within 10 days, along with the required contributor information. 2 U.S.C. § 432(b)(2)(B); 11 C.F.R. § 102.8(b)(2).

9. TenetPAC's disclosure reports indicate that 24 of the contributions made during the time period described, totaling \$28,850, were not timely forwarded to FedPAC.

V. Respondents failed to timely forward \$28,850 in contributions to FedPAC along with the required contributor information, in violation 2 U.S.C. § 432(b)(2)(B).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of four thousand dollars (\$4,000), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lawrence M. Noble

General Counsel

BY:

Lois G. Lerner  
Associate General Counsel

5/25/99  
Date

FOR THE RESPONDENTS:

Christa R. Sulzback  
(Name)

(Position)

April 29, 1999  
Date